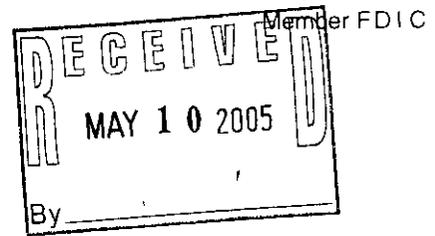


# METROPOLITAN BANK

2201 W Cermak Road • Chicago, Illinois 60608 • (773) 254-1000



May 6, 2005

FDIC  
Mr Robert E Feldman  
Executive Secretary  
Attention Comments  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

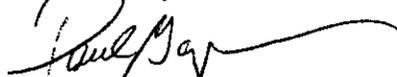
Mr Feldman

I am the president of a small \$230 million community bank located in a low to moderate income area on the west side of Chicago. Like most community banks we make loans for housing, development and small businesses. Our market area has remained the Pilsen and Little Village communities for over 90 years. The banking needs of this vibrant area are served by the local community lending institutions. I applaud the increase in the asset threshold for "Big Bank" status to \$1 billion and I welcome any relief from the constraints that limit our ability to service our communities.

I am writing to express my opposition to the additional restrictions the proposed Community Development standard may bring. The time and resources required for small banks to understand and comply with such programs draws resources away from our core business, which is providing loans and services tailored to meet the needs of the community. It has been my experience that having small banks meet these types of "investment tests" defeats the purpose of what the regulation is trying to achieve. When banks are required to set aside assets for mandated purposes that have no direct measurable benefit to one's market area, then we have missed the opportunity to put these funds back into the community through the normal course of business.

Thank you for the opportunity to comment.

Sincerely,



Paul Gaughan  
President

Metropolitan Bank and Trust Company